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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

STANMORE C. COOPER,

Plaintiff,

v.

FEDERAL AVIATION
ADMINISTRATION; SOCIAL SECURITY
ADMINISTRATION; UNITED STATES
DEPARTMENT OF TRANSPORTATION,

Defendant.

No. C 07-1383 VRW

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINES**

STIPULATION

1. Pursuant to the parties' stipulation, on January 28, 2008, the Court set the deadline for expert discovery as May 28, 2008. On March 10, 2008, pursuant to the parties' stipulation, the Court extended the deadline for filing dispositive motions to May 1, 2008, extended the last day for hearing on dispositive motions to June 5, 2008, and continued the pretrial conference to August 7, 2008.

2. Plaintiff filed a motion for partial summary judgment on April 28, 2008. Defendants filed a motion for summary judgment on May 1, 2008.

3. On May 8, 2008, the Court continued the hearing date for the parties' cross motions for summary judgment from June 5, 2008 to June 12, 2008, at 2:30 p.m.

4. Defendants' counsel are not available on June 12, 2008. The parties have reviewed the Court's website for a list of available hearing dates. Given the unavailability of defendants' counsel on June 12, 2008, the parties respectfully stipulate to continue the hearing date for the parties' cross motions for summary judgment to August 21, 2008, at 2:30 p.m., and to continue the pre-trial conference in this matter to October 16, 2008. The parties further stipulate to extend the deadline for expert discovery to September 30, 2008.

IT IS SO STIPULATED.

DATED: May 9, 2008

Respectfully submitted,
JOSEPH P. RUSSONIELLO
United States Attorney

/s/ Jennifer S Wang
JENNIFER S WANG
Assistant United States Attorney

DATED: May 9, 2008

REED SMITH, LLP

/s/ James M. Wood
JAMES M. WOOD
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Attorneys for Plaintiff Stanmore C. Cooper

~~PROPOSED~~ ORDER

Pursuant to the parties' stipulation and good cause having been shown, it is ordered that:

1. The hearing on the parties' cross motions for summary judgment is continued to August 21, 2008, at 2:30 p.m.
2. The pre-trial conference is continued to October 16, 2008, at 3:30 p.m.
3. The expert discovery cut-off is extended to September 30, 2008.

IT IS SO ORDERED.

DATED: 5/12/08

